

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

KING COUNTY,

Plaintiff,

v.

BP P.L.C., a public limited company of  
England and Wales, CHEVRON  
CORPORATION, a Delaware corporation,  
CONOCOPHILLIPS, a Delaware  
corporation; EXXON MOBIL  
CORPORATION, a New Jersey corporation,  
ROYAL DUTCH SHELL PLC, a public  
limited company of England and Wales, and  
DOES 1 through 10,

Defendants.

Case No. 2:18-CV-00758

**CHEVRON CORPORATION'S  
NOTICE OF PENDENCY OF OTHER  
ACTIONS OR PROCEEDINGS**

Pursuant to Civil Local Rule 3(h), Defendant Chevron Corporation gives notice that the following materially similar actions have been filed against the same five Defendants in the above-captioned action (and, in some cases, additional defendants) in the Northern District of California and the Southern District of New York: *City and County of San Francisco v. BP P.L.C., et al.* (Case No. 3:17-cv-6012-WHA); *City of Oakland v. BP P.L.C., et al.* (Case No. 3:17-cv-6011-WHA); *County of San Mateo v. Chevron Corp. et al.* (Case No. 3:17-cv-4929-

VC); *City of Imperial Beach v. Chevron Corp., et al.* (Case No. 3:17-cv-4934-VC); *County of Marin v. Chevron Corp., et al.* (Case No. 3:17-cv-4935-VC); *County of Santa Cruz v. Chevron Corp. et al.* (Case No. 3:18-cv-450-VC); *City of Santa Cruz v. Chevron Corp. et al.* (Case No. 3:18-cv-458-VC); *City of Richmond v. Chevron Corp., et al.* (3:18-cv-732-VC); and *City of New York v. BP P.L.C., et al.*, (Case No. 1:18-cv-00182-JFK).<sup>1</sup>

As here, in these actions, various cities and counties purport to bring state common law claims for public nuisance and trespass based on alleged injuries arising from the phenomena of global warming and climate change. The injuries alleged by these cities and counties, like Plaintiff's here, include sea level rise and flood damage. Plaintiffs in all these actions, like Plaintiff here, claim that the Defendants can be held liable for these and other alleged injuries based on their production and sale of fossil fuels, although they do not allege that the Defendants' conduct violated any federal or state statute or regulation. And similar to Plaintiff here, these cities and counties seek relief in the form of compensatory damages and an abatement fund to finance measures to remedy their purported injuries. As the cases are presently postured, no party is requesting a transfer pursuant to 28 U.S.C. § 1407 at this time.

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<sup>1</sup> This notice is submitted subject to and without waiver of any defense, affirmative defense, or objection, including personal jurisdiction, insufficient process, or insufficient service of process.

1 Dated: May 25, 2018

GIBSON, DUNN & CRUTCHER LLP

2 By: *s/Theodore J. Boutrous, Jr.*  
3 *s/Joshua S. Lipshutz*

4 Theodore J. Boutrous, Jr. (*pro hac pending*)  
tboutrous@gibsondunn.com  
5 Joshua S. Lipshutz (*pro hac pending*)  
jlipshutz@gibsondunn.com

6 333 South Grand Avenue  
Los Angeles, CA 90071  
7 Telephone: +213 229 7000  
Facsimile: +213 229 7520

8 ORRICK, HERRINGTON & SUTCLIFFE LLP

9 By: *s/Robert M. McKenna*  
10 *s/Adam N. Tabor*

11 Robert M. McKenna (WSBA No. 18327)  
rmckenna@orrick.com  
12 Adam Nolan Tabor (WSBA No. 50912)  
atabor@orrick.com

13 701 Fifth Ave., Suite 5600  
Seattle, WA 98104  
14 Telephone: +1 206 839 4300  
Facsimile: +1 206 839 4301

15 STERN & KILCULLEN, LLC

16 By: *s/Herbert J. Stern*  
17 *s/Joel M. Silverstein*

18 Herbert J. Stern (*pro hac pending*)  
hstern@sgklaw.com  
19 Joel M. Silverstein (*pro hac pending*)  
jsilverstein@sgklaw.com

20 325 Columbia Turnpike, Suite 110  
P.O. Box 992  
21 Florham Park, NJ 07932-0992  
Telephone: +973 535 1900  
22 Facsimile: +973 535 9664

23 SUSMAN GODFREY LLP

24 By: *s/Neal S. Manne*  
25 *s/Erica Harris*

26 Neal S. Manne (*pro hac pending*)  
nmanne@susmangodfrey.com  
27 Erica Harris (*pro hac vice pending*)  
eharris@susmangodfrey.com

1000 Louisiana, Suite 5100  
Houston, TX 77002  
Telephone: +713.651.9366  
Facsimile: +713.654.6666

*Attorneys for Defendant Chevron Corporation*